Date: October 10, 2001

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the
Functional Carrier Bill Evaluation (TVV-11).

Exception:

**BellSouth issued CABS bills which reflect incorrect quantities for Unbundled
Switching and Transport usage. (TVV11)**

Background:

In the course of executing the Functional Usage Evaluation (TVV11), KPMG Consulting
completed a variety of test calls including calls on unbundled lines during the period
between December 11-14, 2000. KPMG Consulting examined the corresponding
December and January CABS bills and observed inconsistencies between the expected
and actual results. The expected results were calculated using the Daily Usage Feed
(DUF) records sent by Bellsouth-Florida.

Issue:

Bellsouth rendered bills to the KPMG Consulting CLEC with incorrect quantities of
Unbundled Transport Shared Transport Access Tandem Originating minutes.
Inconsistencies were observed in each of the following rate categories:

1. Unbundled transport shared transport
2. Unbundled transport facilities termination end-office (EO) to end-office
3. Unbundled transport facilities termination EO to Tandem
4. Unbundled transport facilities termination TOPS to EO
5. Unbundled transport tandem switching
6. Unbundled local switching – switching functionality

<u>Category 1: Unbundled Transport Shared Transport</u>

Inconsistencies in this category consisted of differences in the distribution of minutes
across several mileage distances. Additionally, there were differences in the distances
expected, based on KPMG Consulting calculations, and those actually reflected on the
bills.

<u>Categories 2 to 6</u>

Inconsistencies in these categories consisted of differences in the expected number of minutes, as calculated by KPMG Consulting, and those reflected on the bill.

The following table provides examples of the discrepancies found in the different rate categories:

1116	38	42	35	298	214
192	92	167	16	84	23
n/a	n/a	n/a	n/a	233	12
n/a	n/a	n/a	n/a	11	1
1308	**130**	**209**	**51**	**626**	**250**
1116	38	42	32	297	210
155	208	141	184	47	61
1271	**246**	**183**	**216**	**344**	**271**
17	16	10	10	6	15
n/a	n/a	6	6	12	12
n/a	n/a	0	77	0	1
17	**16**	**16**	**93**	**18**	**28**
24	42	18	58	32	29
24	**42**	**18**	**58**	**32**	**29**
1116	38	42	32	297	210
201	224	167	194	84	76
n/a	n/a	6	6	12	12
n/a	n/a	0	77	0	1
1317	**262**	**215**	**309**	**393**	**299**
3724	3708	3202	3138	3627	3619

244	262	166	230	79	285
1206	288	163	274	379	201
175	180	202	524	233	234
3	90	0	149	11	82
5352	**4528**	**3569**	**4316**	**4329**	**4521**

Amendment:

Bellsouth's response to Exception 44 identified the following four scenarios that contributed to the differences between the expected and actual number of minutes of use cited above:

1. Custom Local Area Signaling Services, such as Touch Star services, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.

2. Intralata toll calls LPIC'd to BellSouth were originally considered un-billable. A mechanical billing method for applying UNE usage to BellSouth carried Intralata toll messages will be implemented May 25, 2001. DUF records are sent to the CLEC for their billing purposes, however.

3. Usage sensitive calls, such as 3-way calling, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.

4. Alternately billed non-UNE originated or terminated calls, such as third number and credit card calls, are not billable records for UNE usage rate elements as defined by BellSouth. However, DUF records are sent to the CLEC for their billing purposes.

KPMG Consulting conducted a DUF retest between May 29th and June 1st, 2001. Inconsistencies were observed in each of the following rate categories:

1. Unbundled transport shared transport
2. Unbundled transport facilities termination end-office (EO) to end-office
3. Unbundled transport facilities termination EO to Tandem
4. Unbundled transport facilities termination TOPS to EO
5. Unbundled transport tandem switching – FL to EC
6. Unbundled transport tandem switching – Trunk Port
7. Unbundled local switching – switching functionality

8. Unbundled local switching – Trunk Port

<u>Category 1</u>

Inconsistencies were observed in the mileages reported, as well as the distribution of minutes across several mileage distances. A summary of the differences is provided in the table below: (The detail is included as Attachment A).

305 Q95-5134 134	Local	5, 11, 17, 51, 56, 58	10
MIAMFLOL68E	Tandem	11	--
305 Q97-2336 336	Local	5, 9, 10, 11, 14, 51, 56, 58	--
MIAMFLOL68E	Tandem	5, 9, 10, 11, 14, 58	--

Categories 2 to 8

39	50	11	28.21%	117	58	-59	-50.43%
49	50	1	2.04%	76	81	5	6.58%
9	10	1	11.11%	12	15	3	25.00%
5	9	4	80.00%	23	17	-6	-26.09%
62	60	-2	-3.23%	110	96	-14	-12.73%
124	118	-6	-4.84%	220	193	-27	-12.27%
199	209	10	5.03%	351	315	-36	-10.26%
94	118	24	25.53%	124	194	70	56.45%

31	31	0	0.00%	42	22	-20	-47.62%
25	58	33	132.00%	27	26	-1	-3.70%
5	4	-1	-20.00%	5	7	2	40.00%
6	6	0	0.00%	9	6	-3	-33.33%
36	61	25	69.44%	40	34	-6	-15.00%
69	124	55	79.71%	75	68	-7	-9.33%
156	211	55	35.26%	181	173	-8	-4.42%
65	124	59	90.77%	35	66	31	88.57%

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625	2	-623	-99.68%	131	0	-131	-100.00%
102	2	-100	-98.04%	79	0	-79	-100.00%
505	0	-505	-100.00%	11	0	-11	-100.00%
13	0	-13	-100.00%	28	0	-28	-100.00%
102	2	-100	-98.04%	175	57	-118	-67.43%
204	4	-200	-98.04%	250	122	-128	-51.20%
764	58	-706	-92.41%	724	588	-136	-18.78%
39	4	-35	-89.74%	247	121	-126	-51.01%

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	56	78	22	39.29%	36	0	-36	-100.00%
	98	100	2	2.04%	0	0	0	0.00%
	25	22	-3	-12.00%	36	0	-36	100.00%
	0	0	0	0.00%	0	0	0	0.00%
	127	121	-6	-4.72%	36	0	-36	-100.00%
	220	221	1	0.45%	72	0	-72	-100.00%
	434	500	66	15.21%	39	39	0	0.00%
	98	220	122	124.49%	39	0	-39	-100.00%

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Categories 2 to 8 – Rate element quantities by CLLI code

38	50	12	31.58 %	97	58	-39	-40.21%
31	50	19	61.29%	68	81	13	19.12%
7	10	3	42.86%	9	15	6	66.67%
4	9	5	125.00%	13	17	4	30.77%
41	60	19	46.34%	89	96	7	7.87%
76	118	42	55.26%	169	193	24	14.20%
156	209	53	33.97%	295	315	20	6.78%
74	118	44	59.46%	169	194	25	14.79%

Second Amendment

Following discussions between KPMG Consulting and BellSouth CABS billing Subject Matter Experts (SMEs), BellSouth provided new information with regard to how to calculate usage billing. The new information is shown below:

1   LRN is used to calculate mileages based on module 17B on the DUF record.
2   Directory assistance call completion events generate three DUF records, the directory assistance (DA) record, the DA call completion (DACC) record, and the record for the actual local or toll call resulting from the call completion: the DA and DACC portions are billed per event; the rate elements from the DACC call flow are only applicable to the local/toll record.
3   On alternately-billed calls, the billing account placement and rating is based on the originating telephone number – not the billed-to telephone number.

KPMG Consulting has recalculated expected mileage bands and expected billing by CLLI code based on the new information provided by BellSouth.

The results are presented below:
<u>Category 1 – Mileage Band Summary</u>

561 Q██████ S█	Local	5, 7, 8, 10, 37, 38, 40, 41	5, 7, 8, 10, 11, 37, 40
W█████████	Tandem	0, 5, 11, 13, 41	5, 10, 11, 13
305 Q██████ S██	Local	5, 56	56
MIAMFLOL█ME	Tandem	0, 5, 10, #NA	5, 5, 5, 5, 10
305 Q97-2330 S36	Local	5, 10, 11, 51, 56, 58	--
MIAMFLOL█ME	Tandem	0, 5, 5, 9, 10, 11, 14, #NA	--
561 Q█5-5134 134	Local	4, 5, 24, 27, 30	4, 5, 24, 27, 27
FTLDFLMR█S0	Tandem	0, 5, 12, 17	5, 12, 13, 17

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63	31	32	50.79%	40	22	-18	-45%
53	58	5	9.43%	27	26	-1	-3.70%
5	4	-1	-20.00%	4	7	3	75%
6	6	0	0.00%	6	6	0	0.00%
58	61	3	5.17%	37	34	-3	-8.11%
113	124	11	9.73%	70	68	-2	-2.86%
204	211	7	3.43%	169	173	4	2.37%
113	124	11	9.73%	69	66	-3	-4.35%

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114	2	-112	-98.25%	116	0	-116	-100.00%
96	2	-94	-97.92%	88	0	-88	-100.00%
4	0	-4	-100.00%	8	0	-8	-100.00%
9	0	-9	-100.00%	22	0	-22	-100.00%
109	2	-107	-98.17%	116	57	-59	-50.86
214	4	-210	-98.13%	225	122	-103	-45.78%
746	58	-688	-92.23%	693	588	-105	-15.15%
212	4	-208	-98.11%	225	121	-104	-46.22%

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140	78	-62	-44.29	36	0	-36	-100.00%
115	100	-15	-13.04%	0	0	0	0.00%
21	22	1	4.76%	36	0	-36	100.00%
0	0	0	0.00%	0	0	0	0.00%
123	121	-2	-1.63%	36	0	-36	-100.00%
226	221	-5	-2.21%	72	0	-72	-100.00%
526	500	-26	-4.94%	39	39	0	0.00%
250	220	-30	-12.00%	75	0	-75	-100.00%

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Impact:

A CLEC's ability to accurately project revenue and operating expenses is based, in part, on accurate billings from the ILEC. Incorrect billing can distort financial planning. In addition, incorrect charges on CLEC bills may cause a CLEC to incur added costs to reconcile bills and pursue bill corrections.

KPMG Consulting has further concluded that many of the discrepancies between the expected and actual results are due to the inadequacy of existing UNE-P usage billing documentation and the absence of specific documentation for DUF-to-billing reconciliation. Some examples of information that is not documented are as follows:

■ Local routing number (LRN) is used to compute mileage on certain calls based on module 17B on category 10 records.

■ Rate elements for directory assistance call completion events are only billed based on the local/toll call record using call flows in the Dx series, and not the typical call flows for local/toll calls: 1, 2, 3, 4, 5, 7. The directory assistance and call completion records are billed per-occurrence ("hit") and the individual rate elements do not apply.

■ BellSouth has stated that not as many rate elements are billed for customer service calls as are currently documented.

■ On alternately-billed calls the bill-to number does not drive the billing account (Q-Account). It is determined by the from-number. Records that are billed to a UNE-P line but neither originate nor terminate on a UNE-P number will not appear on a CABS bill. If a call originates or terminates (in the case of access calls) on a UNE-P line but bills to resale the call will show up on the CABS bill.

■ When a credit is issued, the original call is billed as usual but the credit is not.

Ex 44 KPMG Clarification Questions

1. 'Billing To' Issue
Question: Should KPMG use the 'Billed To Number' in the DUF record to determine on which UNE bill the usage for the calls will be reflected.
Answer: No. This number is for the CLEC to use to determine how to bill the end user. It has no relationship to BellSouth's billing to the CLEC. The 'From Number' (for originating records) and the 'To Number' (for terminating records) should be used to drive usage to the UNE bills.

Question: How is the resale indicator of 6 or UNE indicator of 7 set?
Answer: The resale indicator of 6 is set on the DUF record if the call is non-UNE originating or BST originating and it is billing to a resale number. The UNE indicator of 7 is set if it is UNE originating or an access UNE terminating record.

Additional Information Request: Provide the billing account number of the calls denoted on KPMG call detail as OCN (billing on a different OCN) or Acct (billing on a different account).
Response: The correct billing account numbers are noted by the individual calls on the attached spreadsheets. BellSouth has verified that all KPMG test calls are billing on the correct account.

Documentation for this issue can be found on the Web at www.interconnection.bellsouth.com/products/billing/ADUF.pdf or **www.interconnection.bellsouth.com/products/billing/ODUF.pdf**

2. Directory Assistance Billing

Question: How should DUF records associated with Directory Assistance (DA) be billed? What call flows should be used? Should all DUF records associated with DA calls drive to usage rate elements?

Answer: The appropriate call flows and categories of charges are shown below:

Directory Assistance – 1 UNE DUF Record

10-01-32	DA 'Hit' Charge	D1	D1 or D2 series depending on CLEC contract	Switching Rate elements and DA 'Hit' Charge

Directory Assistance Call Completion –
Multiple UNE DUF Records: 1 End To End Call Event

10-01-32	DA 'Hit' Charge	D3	D3 or D4 series depending on CLEC contract and the 'To Number'.	Hit Charges only – no switching rate elements – the companion local or toll record is used to bill the switching rate elements.
10-00-18	Call Completion	D3	D3 or D4 series depending on CLEC contract and the 'To Number"	DA Call Completion
10-00-31(local) or 10-10-01 (toll)	Usage	05	D3 or D4 series depending on CLEC contract and the 'To Number".	Switched rate elements only

Note: From end to end, the call event will only bill based on one call flow. It is not correct to bill the same switched rate elements more than one time for the same call. Call Flow information is documented on the Web at
http://www.interconnection.bellsouth.com/guides/unedocs/2wireVGrdULPSCombV er6.pdf

3. **Call Flow 15A**
Question: Is there anything in the DUF record to allow KPMG to determine that Call Flow 15A should be used and that mileage should be to the ICO?
Answer: For the particular call under question, KPMG called an end user in ICO territory. Therefore, a call flow appropriate to this situation should apply. There are several call flows that address ICO calling scenarios.

Call Flow information is documented on the Web at http://www.interconnection.bellsouth.com/guides/unedocs/2wireVGrdULPSCombVer6.pdf

4. **Local Routing Number**
Question: Is there a way for KPMG to get LRN (Local Routing Number) to use to compute mileage?
Answer: For ODUF, when calls are placed to ported telephone numbers, the appropriate module is used as documented in the EMI guidelines. For ADUF, the LRN field is populated in the DUF record as documented in the EMI guidelines. The ordering form for the EMI document is on the ATIS website at http://www.atis.org/atis/clc/obf/obfdocs.htm

5. **Calls outside the Test Dates not Expected by KPMG**
Question: Provide calls outside the test dates that are on BellSouth bills but not included on expected results.
Answer: These calls are added to the attached spreadsheets for the appropriate end office.

6. **TOPS Mileage**
Question: Can KPMG know which TOPS office serves an NXX?
Answer: There is no industry standard to provide this info to a CLEC.

Other Issues:

7. **Credit Requests:**
Credit request calls are not billed to the CLEC. The original call is billed since the BellSouth network is used.

8. **Ports**
Port charges should be billed based on the appropriate call flow.

9. **Disconnect/ New Connect – Disconnect and New Connect on the same day.**
Usage on the date of the disconnect is associated with the disconnected account, not the new account.

10. Direct vs. Tandem
A call will never be billed as both direct and tandem routed.

11. Errored Calls
BellSouth found that 12 calls errored due to a program problem and did not bill.

12. 611 Calls to the BellSouth Repair Center
BellSouth found that calls to BellSouth repair were not being billed as shown in the documented call flows. This documentation will be updated. These calls should bill based on call flow 52. Call Flow information is documented on the Web at http://www.interconnection.bellsouth.com/guides/unedocs/2wireVGrdULPSCombVer6.pdf

Date: April 24, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

The BellSouth Business Rules for Local Ordering –OSS '99, Issue 9L[1], does not define a process for an unbundled loop (REQTYP A) service migration (ACT V) request from one CLEC to another CLEC. (TVV1)

Background:

BellSouth utilizes two systems to bill for both retail and Competitive Local Exchange Carrier (CLEC) customers: -- Customer Records Information System (CRIS) and the Carrier Access Billing System (CABS).

After a CLEC migrates one or more of a customers' loops without Local Number Portability (LNP) from BellSouth, the CLEC assigns new Telephone Numbers (TNs) to its new customers' account as appropriate. BellSouth then assigns non-dialable Account Numbers (ANs) to the UNE loops that service the CLECs' customer. BellSouth does not maintain a record of CLEC telephone numbers in its systems.

Subsequently, a second CLEC may acquire one or more of the UNE loops previously migrated by the first CLEC. In these cases, the second CLEC must successfully migrate the customer's UNE loops from the first CLEC using the systems provided by BellSouth.

Issue:

The BellSouth Business Rules for Local Ordering do not adequately address the process for REQTYP A/ACT V (designed and non-designed) Local Service Requests (LSRs) for migration of UNE loops from one CLEC to another CLEC[2].

The business rules state that the Existing Account Telephone Number (EATN) is required on the End User (EU) form[3] for REQTYP A/ACT V. However, section 28.4.5.2 includes the following Conditional Usage Notes for the EATN:

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[1] BellSouth Business Rules for Local Ordering – OSS99, *Issue 9L, March 30,* 2001. This document can be found at the following URL: http://www.interconnection.bellsouth.com/guides/html/leo.html
[2] See BellSouth Business Rules for Local Ordering – OSS99, *Issue 9L, March 30,* 2001, sections 3.2.3.9 & 3.2.3.10.

FLA Exception 49 (TVV1).doc

- Prohibited when EAN, LEAN, or LEATN is populated

- Required when the LEAN, LEATN, or EAN are not populated and ACT is V, P, or Q.

Additionally the business rules affecting this REQTYP/ACT combination for CLEC to CLEC migrations does not include required, conditional or optional usage of the ECCKT field[4].

Accordingly, KPMG Consulting populated both the AN and EAN fields and did not populate the EATN field for the following orders:

PON	VER	CC
083022FPTH101011	00	7125
083031FPEH100001	00	7125

KPMG Consulting received TAG front-end edits rejecting these orders stating: "EATN AND AN ARE REQUIRED FOR REQTYP; and "ECCKT REQUIRED WHEN EAN OR LEAN IS POPULATED."

Impact:

The lack of a specified process for migrating a loop service from one CLEC to another could impact CLECs in the following ways:

- **Decrease in Customer Satisfaction.** CLECs might experience delays if they are unable to submit orders due to conflicts between the Business Rules and the TAG front-end edits. A delay in delivering a service to a customer could negatively impact a customer's view of a CLEC's quality of service.

- **Increase in Operating Costs.** Ordering problems might require additional CLEC resources for order completion. Delays in problem resolution could increase the effort expended by CLEC resources to successfully process individual customer orders.

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[3] See BellSouth Business Rules for Local Ordering – OSS99, *Issue 9L, March 30,* 2001, pages 203 & 205.
[4] See BellSouth Business Rules for Local Ordering – OSS99, *Issue 9L, March 30,* 2001, page 207 & 209.

KPMG Consulting

Date: July 27, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

KPMG Consulting has not received timely mechanized rejects from BellSouth's Electronic Data Interchange (EDI) interface. (TVV1)

Issue:

According to Ordering measure O-6 of the Service Quality Measurement Plan[1], BellSouth should return >=97% of mechanized rejects to CLECs within one (1) hour of the local service request. During the production test, KPMG Consulting received mechanized rejects after the one-hour time frame.

The following are the mechanized reject timeliness results as of April 9, 2001 on mechanized rejects using the EDI interface.

Number	86	3	5	9	21	10	5	6	145
Percent	60%	2%	3%	6%	15%	7%	3%	4%	

Following is an example of PONs, which did not receive a mechanized reject from BellSouth within one hour.

010032FPEN100003	01	9993	3/16/01 1:16 PM	3/19/01 5:55 PM
010032FPEN100002	01	9993	3/16/01 1:16 PM	3/19/01 4:50 PM
010032FPEN100001	01	9993	3/16/01 12:53 PM	3/19/01 4:21 PM

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[1] [1] BellSouth OSS Testing Florida Interim Performance Metrics, Measure Descriptions October 2000

FLA 3rd Amended Exception 51 (TVV1).doc

005061FPEN101001	00	9990	3/16/01 9:57 AM	3/19/01 9:58 AM
020011FPEN100003	00	9990	3/16/01 2:41 PM	3/19/01 2:22 PM
010161FPEN100001	00	9993	3/16/01 3:41 PM	3/19/01 2:47 PM
020011FPEN101002	00	9990	3/16/01 10:58 AM	3/19/01 9:49 AM
010161FPEN100002	00	9993	3/23/01 12:50 PM	3/26/01 11:33 AM
010111FPEN100001	00	9993	3/23/01 4:16 PM	3/26/01 2:29 PM
072011FPEH100002	00	9990	3/13/01 5:48 PM	3/15/01 9:53 AM

BellSouth response indicated that the LSRs associated with these orders were populated in such a way as to fall out for manual handling in the LCSC and therefore should be considered as non-mechanized orders for the purposes of the timeliness review.

KPMG Consulting agreed with BellSouth's response .

Amended Issue:

KPMG Consulting converted Vers on table above from alpha to numeric version.

2nd Amended Issue:

During the production test of the EDI interface BellSouth returned a number of mechanized rejects in greater than the one-hour time frame.

The Following are the mechanized reject timeliness results as of June 8, 2001 for mechanized rejects received via the EDI interface.

Number	194	4	8	1	0	0	0	0	207
Percent	94%	2%	4%	0%	0%	0%	0%	0%	

Following is an example of PONs, which did not receive a mechanized reject from BellSouth within one hour.

002071FPEN000001	00	9990	03/23/01 02:54 PM	03/23/01 05:31 PM
002211FPEJ100007	00	9990	05/16/01 04:30 PM	05/16/01 05:37 PM
005081FPEJ100001	00	9990	03/23/01 03:23 PM	03/23/01 05:31 PM
005101FPEN100001	00	9990	03/23/01 03:09 PM	03/23/01 05:31 PM
006031FPEJ000007	00	9990	03/23/01 03:13 PM	03/23/01 05:31 PM
007061FPEJ101001	00	9990	03/28/01 05:35 PM	03/28/01 08:07 PM
011061FPEN000001	00	9993	03/23/01 03:09 PM	03/23/01 05:31 PM
011121FPEN101003	00	9993	04/10/01 12:49 PM	04/10/01 06:38 PM
012051FPEJ001003	00	9993	04/03/01 06:48 PM	04/03/01 07:50 PM
017061FPEJ100005	00	9993	03/23/01 03:09 PM	03/23/01 05:31 PM
072062FPEH100001	00	9993	03/23/01 03:09 PM	03/23/01 05:31 PM
076022FPEH101001	00	9993	05/16/01 03:30 PM	05/16/01 04:34 PM
090011FPEH000003	00	9993	03/23/01 03:32 PM	03/23/01 05:31 PM

BellSouth response to the PONs indicated that delays were due to a downstream system problem, internal volume testing and a test job picking up production orders. BellSouth implemented a system fix on March 23, 2001 and requested that KPMG Consulting begin a re-test after that date.

KPMG Consulting has reviewed response times after the March 23rd date and have listed our results below.

3rd Amended Issue:

During the production test of the EDI interface BellSouth returned a number of mechanized rejects in greater than the one-hour time frame.

The Following are the mechanized reject timeliness results as from March 24, 2001 through July 16, 2001 for mechanized rejects received via the EDI interface.

Number	186	3	3	2	2	0	1	1	198
Percent	94%	1.5%	1.5%	1%	1%	0%	.5%	.5%	

Following is a list of PONs, which did not receive a mechanized reject from BellSouth within one hour.

068021FPEI004003	00	7125	07/11/01 03:25 PM	07/12/01 10:31 AM
071051FPEI002007	00	7125	07/02/01 10:15 AM	07/02/01 12:59 PM
071051FPEI002004	00	7125	06/29/01 11:51 AM	07/02/01 02:59 PM
071061FPEI001008	00	7125	06/28/01 12:50 PM	06/28/01 05:12 PM
071051FPEI000003	05	7125	06/27/01 04:29 PM	06/28/01 01:29 PM
071051FPEI000003	03	7125	06/26/01 10:13 AM	06/26/01 02:12 PM
071051FPEI000003	00	7125	06/01/01 12:24 PM	06/04/01 09:59 AM
002211FPEJ100007	00	9990	05/16/01 04:30 PM	05/16/01 05:37 PM
076022FPEH101001	00	9993	05/16/01 03:30 PM	05/16/01 04:34 PM
011121FPEN101003	00	9993	04/10/01 12:49 PM	04/10/01 06:38 PM
012051FPEJ001003	00	9993	04/03/01 06:48 PM	04/03/01 07:50 PM
007061FPEJ101001	00	9990	03/28/01 05:35 PM	03/28/01 08:07 PM

FLA 3rd Amended Exception 51 (TVV1).doc

Impact:

The receipt of timely rejects is a critical factor in the CLEC's ability to process service requests, and meet its customer's needs. Delays in the return of rejects could have a negative impact on the timeliness of the ordering process, possibly lowering overall customer satisfaction.

Date: July 5, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

KPMG Consulting has not received timely mechanized rejects from BellSouth's Telecommunications Access Gateway (TAG) interface. (TVV1)

Background:

According to Ordering measure O-6 Reject Interval, of the Service Quality Measurement Plan[1], BellSouth should return >=97% mechanized rejects to CLECs within 1 hour of a local service request.

Issue:

During the production test of the TAG interface BellSouth returned a number of mechanized rejects in greater than the one-hour time frame.

The following are the mechanized reject timeliness results as of April 23, 2001 for mechanized rejects received via the TAG interface.

Number	78	5	2	5	26	26	1	0	143
Percent	55%	4%	1%	4%	18%	18%	1%		

Following is an example of orders which did not receive a mechanized reject from BellSouth within one hour:

001051FPTJ100027	03	9990	4/16/01 1:17 PM	4/18/01 3:17 PM

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[1] BellSouth OSS Testing Florida Interim Performance Metrics, Measure Descriptions October 2000

FLA 2nd Amended Exception 54 (TVV1).doc

010011FPTN100013	00	9993	4/16/01 4:13 PM	4/18/01 3:48 PM
022011FPTJ101016	00	9993	3/30/01 3:57 PM	4/1/01 3:23 PM
010021FPTN100004	00	9993	4/16/01 4:25 PM	4/18/01 3:48 PM
010011FPTN100014	00	9993	4/16/01 4:15 PM	4/18/01 3:19 PM
002121FPTJ100010	00	9990	3/13/01 3:24 PM	3/15/01 9:18 AM
020011FPTN100012	00	9990	3/13/01 5:17 PM	3/15/01 10:52 AM
002151FPTJ100010	00	9990	3/13/01 5:17 PM	3/15/01 10:51 AM
020011FPTN100011	00	9990	3/13/01 5:17 PM	3/15/01 10:51 AM
016061FPTJ100003	02	9993	4/17/01 12:38 PM	4/18/01 7:46 PM

Amended Issue:

During the production test of the TAG interface BellSouth returned a number of mechanized rejects in greater than the one-hour time frame.

The following are the mechanized reject timeliness results as of May14, 2001 for mechanized rejects received via the TAG interface.

Number	28	4	2	2	2	1	1	0	40
Percent	70%	10%	5%	5%	5%	3%	3%		

Following is an example of orders which did not receive a mechanized reject from BellSouth within one hour:

015011FPTN105008	01	9993	04/27/01 01:42 PM	04/30/01 10:45 AM

FLA 2nd Amended Exception 54 (TVV1).doc

019031FPTJ101013	00	9993	03/15/01 10:59 AM	03/16/01 11:16 AM
007061FPTJ102013	00	9990	03/29/01 04:09 PM	03/30/01 11:32 AM
002201FPTJ102011	00	9990	03/29/01 04:10 PM	03/30/01 11:32 AM
002151FPTJ101011	00	9990	03/30/01 11:32 AM	03/30/01 05:45 PM
006031FPTJ000011	00	9990	03/15/01 08:45 AM	03/15/01 10:53 AM
022011FPTJ100013	00	9993	03/15/01 08:47 AM	03/15/01 10:53 AM
022021FPTJ100013	00	9993	03/15/01 08:53 AM	03/15/01 10:53 AM
006031FPTJ000012	00	9990	03/15/01 05:09 PM	03/15/01 06:16 PM

Second Amended Issue:

During the production test of the TAG interface BellSouth returned a number of mechanized rejects in greater than the one-hour time frame by returning only 81% of mechanized rejects within the 1 hour timeframe.

The following are the mechanized reject timeliness results as of June 8, 2001 for mechanized rejects received via the TAG interface.

Number	135	7	3	8	5	9	0	0	167
Percent	81%	4%	2%	5%	3%	5%			

Following is a complete list of orders which did not receive a mechanized reject from BellSouth within one hour:

010151FPTJ100018	00	9993	04/09/01 09:40 AM	04/10/01 03:16 PM
010151FPTJ100020	00	9993	04/09/01 11:25 AM	04/10/01 03:16 PM

FLA 2nd Amended Exception 54 (TVV1).doc

010161FPTN101008	02	9993	04/09/01 05:15 PM	04/10/01 08:15 PM
011032FPTN100011	00	9993	04/09/01 01:23 PM	04/10/01 03:16 PM
002211FPTJ102011	00	9990	04/09/01 06:28 PM	04/10/01 08:15 PM
005101FPTN101008	00	9990	04/09/01 02:51 PM	04/10/01 03:23 PM
005101FPTN104009	00	9994	04/09/01 03:00 PM	04/10/01 03:23 PM
005101FPTN101012	00	9990	04/09/01 03:06 PM	04/10/01 03:23 PM
019031FPTJ101013	00	9993	03/15/01 10:59 AM	03/16/01 11:16 AM
074021FPTF000013	00	9993	03/29/01 03:05 PM	03/30/01 11:31 AM
005061FPTN104008	00	9990	03/15/01 02:52 PM	03/16/01 11:16 AM
007061FPTJ102013	00	9990	03/29/01 04:09 PM	03/30/01 11:32 AM
002201FPTJ102011	00	9990	03/29/01 04:10 PM	03/30/01 11:32 AM
002151FPTJ100018	00	9990	04/11/01 11:33 AM	04/12/01 06:16 AM
015011FPTN104008	02	9993	04/10/01 09:49 AM	04/10/01 08:15 PM
002151FPTJ101011	00	9990	03/30/01 11:32 AM	03/30/01 05:45 PM
002141FPTJ000013	01	9990	03/15/01 12:48 PM	03/15/01 06:45 PM
022011FPTJ101013	00	9993	03/15/01 02:50 PM	03/15/01 08:46 PM
074021FPTF000011	00	9993	03/20/01 10:56 AM	03/20/01 04:45 PM
074021FPTF000010	00	9993	03/20/01 10:56 AM	03/20/01 04:45 PM
001061FPTJ102017	00	9994	04/10/01 10:59 AM	04/10/01 04:45 PM
013011FPTN100010	00	9993	04/10/01 11:37 AM	04/10/01 05:16 PM
017011FPTN100019	00	9993	04/04/01 11:29 AM	04/04/01 01:45 PM
006031FPTJ000011	00	9990	03/15/01 08:45 AM	03/15/01 10:53 AM
022011FPTJ100013	00	9993	03/15/01 08:47 AM	03/15/01 10:53 AM

FLA 2nd Amended Exception 54 (TVV1).doc

022021FPTJ100013	00	9993	03/15/01 08:53 AM	03/15/01 10:53 AM
076012FPTH100011	00	9993	04/04/01 10:56 AM	04/04/01 12:16 PM
022021FPTJ102016	00	9993	03/30/01 04:02 PM	03/30/01 05:15 PM
006061FPTN002012	00	9990	03/15/01 05:09 PM	03/15/01 06:16 PM
006031FPTJ000012	00	9990	03/15/01 05:09 PM	03/15/01 06:16 PM
022021FPTJ100014	00	9993	03/15/01 05:09 PM	03/15/01 06:16 PM
022011FPTJ100014	00	9993	03/15/01 05:09 PM	03/15/01 06:16 PM

Impact:

The receipt of timely rejects is a critical factor in the CLEC's ability to process service requests, and meet its customer's needs. Delays in the return of rejects could have a negative impact on the timeliness of the ordering process, possibly lowering overall customer satisfaction.

Date: May 10, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Work Center Support Evaluation. (PPR-8)

Exception:

BellSouth does not have detailed guidelines for CLEC interaction with the Complex Resale Support Group (CRSG) during the ordering process. (PPR8)

Background:

The BellSouth business rules state that "the Local Carrier Service Center (LCSC) is the single point of contact for a CLEC to manually submit orders"[1]. KPMG Consulting has been instructed by its BellSouth Account Manager, and by other CRSG personnel, to submit specific types of manual complex orders to the CRSG. These orders include, but are not limited to, the following: complex orders with Activity "N", and complex orders that require forms in addition to the Local Service Request (LSR).

CLECs are assigned to the CRSG during the Account Establishment process. CLECs are advised to contact the CRSG directly for assist on complex orders submitted to them.

Issue:

During the interview of BellSouth's CRSG[2], and upon review of BellSouth's internal documentation, KPMG Consulting found that BellSouth did not have the following information about the CRSG available to CLECs:

- CRSG description and scope of services
- CRSG hours of operation
- CRSG internal escalation list
- After hours Escalation procedures

Impact:

Without well-defined and documented procedures, CLECs cannot be certain that BellSouth will provide dependable and consistent assistance in support of their business requirements. This could hinder CLECs' ability to submit orders and deliver service to their customers.

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[1] See BellSouth Business Rules for Local Ordering – OSS99, *Issue 9L, March 30,* 2001, page 177.
[2] Interview with CRSG managers and observation of CRSG System Designers on April 4th, 2001 in Birmingham Alabama.

FLA Exception 57 (PPR8).doc

Date: May 21, 2001

EXCEPTION REPORT

An observation has been identified as a result of test activities associated with the Functional Carrier Bill Evaluation Test (TVV11).

EXCEPTION:

BellSouth failed to cease billing on disconnected auxiliary lines. (TVV11)

Issue:

BellSouth produced bills that contained a variety of service activities associated with service orders placed by KPMG Consulting. A number of billing invoices received by KPMG Consulting contained recurring charges for UNE ports for lines that were disconnected.

BellSouth continued to bill monthly recurring charges of $14.90 for the network element UEPLX for lines that had been disconnected.

Representative occurrences of this issue are found on the invoices with the following billing information:

904 Q59-0568-568	352-490-7959	03/29/01
561 Q59-0568-568	561-832-1972	03/29/01
904 Q59-0568-568	352-490-7959	04/29/01
561 Q59-0568-568	561-832-1972	04/29/01

Impact:

Issuing bills containing erroneous or inappropriate billing information could impact a CLEC's ability to assess or project revenue accurately. A CLEC may project revenue based on its documented service inventory without taking into account unknown expenses emanating from being inappropriately billed by BellSouth. As a result, it could affect a CLEC's business operations, including budgetary planning and resource management.

Date: May 23, 2001

EXCEPTION REPORT

An exception has been identified as a result of test activities associated with the Functional Carrier Bill Evaluation Test (TVV11).

EXCEPTION:

BellSouth bills reflect a rate for a Service Order Mechanized Charge that is inconsistent with the rate contained in the Interconnection Agreement (IA) between BellSouth Telecommunications and the KPMG CLEC. (TVV11)

Issue:

The KPMG CLEC placed Local Service Requests (LSRs) for a variety of services via a mechanized interface. LSRs placed through a mechanized interface are subject to a non-recurring charge, denoted by the Universal Service Order Code (USOC) SOMEC. The applicable rate for this USOC is contained in the Interconnection Agreement (IA) signed by BellSouth Telecommunications and the KPMG CLEC. BellSouth bills reflect a rate for this USOC that is inconsistent with the rate contained in the IA.

According to the updated rate table dated October 27, 2000, contained in the IA, the applicable rate for mechanized Local Service Request (LSR) via a mechanized interface is $2.75 per LSR. KPMG CLEC continues to receive billing invoices that reflect a SOMEC charge of $3.50 per LSR. This charge represents the charge listed in the previous rate table that was published prior to the current rate table.

Representative occurrences of this issue are found on the invoices with the following billing information:

CY6BBQ32	904 Q59-0568-568	352-490-7959	12/29/00
NQCXMVD8A	305 Q89-0961-961	305-358-3970	04/19/01
NY78GG25A	904 Q97-2336-336	904-598-1753	04/17/01
DYR5N011A	904 Q59-4649-649	904-353-3952	03/29/01
NY6F8PK3	904 Q97-2336-336	352-490-5547	12/17/00
NYFT7LL8A	904 Q97-2336-336	352-490-5916	12/17/00

FLA Exception 62 (TVV11).doc

Impact:

The Interconnection Agreement and the BellSouth Intra-State and Inter-State tariff documentation contains all applicable rates or charges that could be assessed to the BellSouth trading partners (CLECs). By not adhering to the rates or charges published in the rate documentation, a CLEC's operating costs are misquoted and the budgetary planning and revenue could be affected.

FLA Exception 62 (TVV11).doc

Date: August 13, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the Maintenance & Repair ECTA Performance Evaluation. (TVV-8).

Exception:

The BellSouth Electronic Communication Trouble Administration (ECTA) system failed to appropriately process 'enterTroubleReport' transactions. (TVV8)

Background:

On May 22, 2001, KPMG Consulting entered 392 trouble tickets (over a period of 12 hours) as part of the ECTA Performance evaluation test. KPMG Consulting testers observed a 14.79% failure rate amongst the "enterTroubleReport" transactions (58 out of 392 transactions). Failures were either a 110 trading partner error or a lack of any response.

The benchmark established for processing "enterTroubleReport" transactions is 95% accuracy[1].

Issue:

The ECTA system failed to process the enter transactions at a level satisfactory to the KPMG Consulting standard of 95%. The table below is a comprehensive list of each unsuccessful attempt made at creating a trouble ticket in the ECTA system.

3056871280	enterTroubleReport	5/22/01 14:38:15	5/22/01 14:38:34	110
8502367977	enterTroubleReport	5/22/01 15:33:18	5/22/01 15:33:20	110
8504297173	enterTroubleReport	5/22/01 15:30:44	5/22/01 15:30:46	110
40730TYNU511750	enterTroubleReport	5/22/01 15:28:16	5/22/01 15:28:18	110
85030TYNU511637	enterTroubleReport	5/22/01 15:28:14	5/22/01 15:28:16	110

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[1] KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BLS guidelines.

FLA Amended Exception 63 (TVV8).doc

4073541559	enterTroubleReport	5/22/01 15:25:43	5/22/01 15:25:46	110
4072263117	enterTroubleReport	5/22/01 15:23:12	5/22/01 15:23:15	110
9544635832	enterTroubleReport	5/22/01 16:20:44	5/22/01 16:20:48	110
85030TYNU511635	enterTroubleReport	5/22/01 18:30:42	5/22/01 18:30:44	110
40730TYNU511633	enterTroubleReport	5/22/01 18:28:13	5/22/01 18:28:15	110
3057693132	enterTroubleReport	5/22/01 18:25:46	5/22/01 18:26:02	110
56180TYNU532304	enterTroubleReport	5/22/01 18:23:15	5/22/01 18:23:17	110
4072488604	enterTroubleReport	5/22/01 17:44:16	5/22/01 17:44:19	110
9547667984	enterTroubleReport	5/22/01 17:28:17	5/22/01 17:28:19	110
3056870549	enterTroubleReport	5/22/01 17:28:15	5/22/01 17:28:17	110
9545222093	enterTroubleReport	5/22/01 17:25:44	5/22/01 17:25:46	110
9547611076	enterTroubleReport	5/22/01 17:23:14	5/22/01 17:23:17	110
9544635084	enterTroubleReport	5/22/01 17:15:47	5/22/01 17:15:50	110
9545225506	enterTroubleReport	5/22/01 16:30:42	5/22/01 16:30:44	110
40730TYNU511754	enterTroubleReport	5/22/01 16:28:55	5/22/01 16:28:57	110
4073544453	enterTroubleReport	5/22/01 16:26:18	5/22/01 16:26:21	110
8504320418	enterTroubleReport	5/22/01 08:18:13	5/22/01 08:18:16	110
3524909588	enterTroubleReport	5/22/01 07:31:33	5/22/01 07:31:35	110
8504324267	enterTroubleReport	5/22/01 11:33:16	5/22/01 11:33:18	110
8504297173	enterTroubleReport	5/22/01 11:30:43	5/22/01 11:30:46	110
9044750714	enterTroubleReport	5/22/01 11:28:16	5/22/01 11:28:18	110

FLA Amended Exception 63 (TVV8).doc

AMENDED EXCEPTION 63
BellSouth Florida OSS Testing Evaluation

9043561849	enterTroubleReport	5/22/01 11:15:46	5/22/01 11:15:50	110
9043541398	enterTroubleReport	5/22/01 10:38:12	5/22/01 10:38:14	110
8504297462	enterTroubleReport	5/22/01 10:33:11	5/22/01 10:33:14	110
5616597161	enterTroubleReport	5/22/01 10:28:17	5/22/01 10:28:21	110
9547648396	enterTroubleReport	5/22/01 10:25:44	5/22/01 10:25:48	110
9547648396	enterTroubleReport	5/22/01 09:30:44	5/22/01 09:30:47	110
8504380686	enterTroubleReport	5/22/01 09:28:16	5/22/01 09:28:18	110
8504297173	enterTroubleReport	5/22/01 13:38:36	5/22/01 13:38:39	110
3057695472	enterTroubleReport	5/22/01 13:33:27	5/22/01 13:33:30	110
3057693132	enterTroubleReport	5/22/01 13:28:13	5/22/01 13:28:16	110
4073525759	enterTroubleReport	5/22/01 13:25:45	5/22/01 13:25:47	110
8502363937	enterTroubleReport	5/22/01 13:23:15	5/22/01 13:23:18	110
4073706711	enterTroubleReport	5/22/01 13:20:48	5/22/01 13:20:51	110
9547611076	enterTroubleReport	5/22/01 12:38:14	5/22/01 12:38:16	110
9043556269	enterTroubleReport	5/22/01 12:33:11	5/22/01 12:33:14	110
9044750714	enterTroubleReport	5/22/01 12:28:16	5/22/01 12:28:22	110
3056817391	enterTroubleReport	5/22/01 12:25:42	5/22/01 12:25:44	110
8504324267	enterTroubleReport	5/22/01 12:20:43	5/22/01 12:20:45	110
4079030578	enterTroubleReport	5/22/01 12:15:45	5/22/01 12:15:48	110
3053747122	enterTroubleReport	5/22/01 11:38:10	5/22/01 11:38:12	110
9043586127	enterTroubleReport	5/22/01 14:28:36	5/22/01 14:28:38	110

FLA Amended Exception 63 (TVV8).doc

4073510218	enterTroubleReport	5/22/01 14:26:06	5/22/01 14:26:08	110
8504297173	enterTroubleReport	5/22/01 14:23:35	5/22/01 14:23:40	110
85030TYNU511637	enterTroubleReport	5/22/01 14:20:42	5/22/01 14:20:45	110
9044751663	enterTroubleReport	5/22/01 09:23:12	5/22/01 09:23:16	110
8504297173	enterTroubleReport	5/22/01 09:18:16	5/22/01 09:18:19	110
8504385537	enterTroubleReport	5/22/01 08:35:46	5/22/01 08:35:48	110
3056871280	enterTroubleReport	5/22/01 08:28:13	5/22/01 08:28:15	110
9544672314	enterTroubleReport	5/22/01 08:28:12	5/22/01 08:28:14	110
9544632259	enterTroubleReport	5/22/01 08:23:14	5/22/01 08:23:17	110
3056871280	enterTroubleReport	5/22/01 14:49:06		No response
3057693132	enterTroubleReport	5/22/01 18:34:33		No response

There were 56 "enterTroubleReport" transactions that generated trading-partner errors and 2 "enterTroubleReport" transactions that generated no response from the ECTA system.

Amendment:
KPMG Consulting performed a re-test for the create transactions and continued to have issues with system performance.

On August 08, 2001, KPMG Consulting entered 176 trouble tickets (over a period of 12 hours) as part of the ECTA Performance evaluation test. KPMG Consulting testers observed an 11.36% failure rate amongst the 'enterTroubleReport' transactions (20 out of 176). Failures were either a 110 trading partner error, a 105 fallback reporting error or a lack of response.

Issue:

The ECTA system failed to process the enter transactions at a level satisfactory to the KPMG Consulting standard of 95%. The table below is a comprehensive list of each unsuccessful attempt made while creating a trouble ticket in the ECTA system.

FLA Amended Exception 63 (TVV8).doc

56180TYNU532304	enterTroubleReport	8/8/01 11:01	8/8/01 11:01	7	110
85030TYNU511637	enterTroubleReport	8/8/01 11:06	8/8/01 11:06	8	110
40730TYNU511754	enterTroubleReport	8/8/01 11:11	8/8/01 11:11	9	110
40730TYNU511633	enterTroubleReport	8/8/01 11:16	8/8/01 11:16	9	110
85030TYNU511635	enterTroubleReport	8/8/01 11:21	8/8/01 11:21	7	110
40730TYNU511750	enterTroubleReport	8/8/01 11:26	8/8/01 11:26	8	110
4073637629	enterTroubleReport	8/8/01 14:46	8/8/01 14:46	21	110
8504324267	enterTroubleReport	8/8/01 17:01	8/8/01 17:02	22	110
8502368429	enterTroubleReport	8/8/01 17:46	8/8/01 17:46	19	110
7864250036	enterTroubleReport	8/8/01 10:41	8/8/01 10:41	2	105
4072482983	enterTroubleReport	8/8/01 10:41	8/8/01 10:41	19	105
30TYNU511567	enterTroubleReport	8/8/01 11:41	8/8/01 11:41	2	105
60/LYFU/776347//SB	enterTroubleReport	8/8/01 11:49	8/8/01 11:49	7	105
8502349598	enterTroubleReport	8/8/01 12:01	8/8/01 12:01	16	105
4073703285	enterTroubleReport	8/8/01 12:41	8/8/01 12:41	16	105
3056883802	enterTroubleReport	8/8/01 12:41	8/8/01 12:41	16	105
8502369436	enterTroubleReport	8/8/01 12:46	8/8/01 12:46	15	105
60/LYFU/775720//SB	enterTroubleReport	8/8/01 14:00	8/8/01 14:00	8	105
60/LYFU/776347//SB	enterTroubleReport	8/8/01 18:48	8/8/01 18:48	6	105
8502368429	enterTroubleReport	8/8/01 19:24			No Response

FLA Amended Exception 63 (TVV8).doc

There were 9 'enterTroubleReport' transactions that generated trading partner errors, 10 'enterTroubleReport' that generated fallback reporting errors and one enterTroubleReport' that generated no response from the ECTA system.

Impact:

CLECs rely on the ECTA system to consistently and reliably process their trouble tickets. If ECTA returns a substantial number of errors or does not provide a response, CLEC customers may experience longer service disruptions or delays in scheduling and completion of other maintenance or repair activities.

Date: June 12, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

BellSouth does not provide an accurate method for assigning the Universal Service Order Code (USOC) to request BellSouth's Operator Services & Directory Assistance (OS/DA) Branding feature. (TVV1)

Background:

BellSouth's OS/DA Branding feature enables Competitive Local Exchange Companies (CLECs) to select Unbranded and/or Custom Branded Operator Services provided by BellSouth operators. Custom Branding identifies a CLEC-defined company name to the CLEC's end users, prior to being placed in queue, or prior to being connected to applicable operator services. The Unbranded option does not identify a specific company name when connecting a CLEC end user to an operator.

USOCs are codes used to identify features, and their associated tariffs, in a service request. BellSouth business rules specify, "The CLEC must float the ZSRC FID behind the Line Class of Service USOC followed by the Selective Routing Code in the feature detail field."[1]

KPMG Consulting submitted a Selective Routing Service Inquiry form to the BellSouth Account Manager, and obtained Line Class of Service Codes and Selective Routing Codes to be used in association with the OS/DA service request as outlined in BellSouth's business rules.

Issue:

The instructions for identifying the Line Class of Service USOC on the Local Service Request (LSR) are incomplete. BellSouth does not provide feature "USOCs, FIDs, or TCIF maintained EDI codes" as required by the BellSouth business rules.[2]

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[1] See *Selective Call Routing Using Line Class Codes CLEC Information Package*, Version 1, May 17, 2001, page 8. This document can be found at the following URL:
http://www.interconnection.bellsouth.com/products/html/unes.html
[2] See *BellSouth Business Rules for Local Ordering – OSS99, Issue 9N May 31,* 2001, pages 1567 &1568. This document can be found at the following URL:
http://www.interconnection.bellsouth.com/guides/html/leo.html

Without a feature code for an OS/DA feature, KPMG Consulting was unable to process the service requests, using any electronic interface. Service requests for OS/DA are rejected by BellSouth's front-end edits when the appropriate code on the feature code field of the Resale Service (RS) form is not specified.

Furthermore, the instructions on how to populate the feature detail field do not clearly indicate whether the ZSRC Field Identifier precedes the Line Class of Service USOC or not.

Impact:

BellSouth's incomplete instructions relating to USOCs for the OS/DA feature may impact a CLEC in the following ways:

- **Decrease in Customer Satisfaction.** A misidentification of a CLEC's operator assistance service might negatively impact a customer's view of a CLEC's service quality.
- **Increase in Operating Costs.** Ordering problems might require additional CLEC resources before completion. Delays in problem resolution might increase the effort CLEC resources must expend before successfully processing individual OS/DA service requests.

AMENDED EXCEPTION 72
BellSouth Florida OSS Testing Evaluation

Date: September 25, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Volume
Performance Test (TVV-2).

Exception:

**KPMG Consulting has not received responses to multiple Local Service Requests
(LSRs) submitted to BellSouth via facsimile (fax). (TVV2)**

Background:

BellSouth's Business Rules for Local Ordering specifies: "A FOC will be returned to the
CLEC either via facsimile or electronically after the Local Carrier Service Center (LCSC)
processes the CLEC's service request(s) and determines that corrections or error
resolutions are not required."[1]

Issue:

As part of the POP Volume Performance Test KPMG Consulting submitted 54 orders to
BellSouth's Atlanta LCSC via fax on May 23, 2001. KPMG Consulting submitted 54
additional orders to BellSouth's Atlanta LCSC via fax on May 31, 2001.

KPMG Consulting has not received a FOC, Rejection, or Clarification, via fax on eight
(8) of the 54 orders submitted on May 23, and (nine) 9 of the 54 orders submitted on May
31.

We have not received a FOC, rejection, or clarification from BellSouth for the following
orders:

0020821AMJ110005	00	9990	05/23/01
0020821AMJ110007	00	9990	05/23/01
0021211AMJ110005	00	9990	05/23/01
0021211AMJ110006	00	9990	05/23/01
0021211AMJ110012	00	9990	05/23/01
0021211AMJ110013	00	9990	05/23/01

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[1] *BellSouth Business Rules for Local Ordering, Issue 9N,* section 2.9.3.

FLA Amended Exception 72 (TVV2).doc

0021211AMJ110014	00	9990	05/23/01
0021211AMJ110021	00	9990	05/23/01
0020822AMJ110001	00	9990	05/31/01
0020822AMJ110004	00	9990	05/31/01
0020822AMJ110007	00	9990	05/31/01
0020822AMJ110008	00	9990	05/31/01
0021212AMJ110001	00	9990	05/31/01
0021212AMJ110004	00	9990	05/31/01
0160412AMN110002	00	9993	05/31/01
0720112AMH110005	00	9991	05/31/01
0720112AMH110021	00	9991	05/31/01

Amendment:

BellSouth's response indicated that KPMG Consulting did not receive responses to 12 of the PONs due to LCSC employee errors. In addition, BellSouth stated that four PONs were received in the LCSC, but not tracked and processed. Based on this information, KPMG Consulting initiated a retest.

KPMG Consulting submitted 54 orders via fax on August 28, 2001 to retest BellSouth's Atlanta LCSC. KPMG Consulting has not received a FOC, Rejection, or Clarification via fax on 11 of the 54 orders.

KPMG Consulting has not received a FOC, rejection, or clarification from BellSouth for the following orders:

0021211BMJ110011	00	9990	08/28/01
0021211BMJ110018	00	9990	08/28/01

FLA Amended Exception 72 (TVV2).doc

0720111BMH110008	00	9991	08/28/01
0720111BMH110011	00	9991	08/28/01
0720111BMH110012	00	9991	08/28/01
0720111BMH110018	00	9991	08/28/01
0720111BMH110019	00	9991	08/28/01
0720111BMH110020	00	9991	08/28/01
0720111BMH110021	00	9991	08/28/01
0720111BMH110022	00	9991	08/28/01
0720111BMH110023	00	9991	08/28/01

Impact:

The absence of BellSouth responses can create extra work for a CLEC to follow up on missing responses, have a negative impact on the timeliness of order completion, and may lower overall CLEC customer satisfaction.

FLA Amended Exception 72 (TVV2).doc

Date: June 28, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

The RoboTAG[1] interface does not provide access to fields that are required for non-designed loop service disconnect (REQTYP A / ACT D), and for ISDN BRI resale service disconnect (REQTYP E / ACT D) requests. (TVV1)

Background:

BellSouth developed RoboTAG as an electronic interface software that combines Telecommunication Access Gateway (TAG) with a front-end Graphical User Interface (GUI). Accordingly, CLECs use RoboTAG for all ordering and pre-ordering functions that are currently electronically enabled.

RoboTAG includes a "UNE OPTIONS" screen, which contains fields that are required to disconnect non-designed loop and ISDN BRI resale services for end users. Screens are automatically made available to RoboTAG users, depending on the REQTYP/ACT combination specified. The RoboTAG front-end validation edits prevent users from submitting orders until all required fields are populated.

Issue:

The "UNE OPTIONS" screen is not available when processing orders with an Activity Type of D (Disconnect). The inability to access the "UNE OPTIONS" screen prevents RoboTAG users from accessing required fields.

According to the BellSouth business rules[2], the following fields are required in disconnecting non-designed loop service accounts:

1. Local Service Office field (LSO)
2. Access Customer Terminal Location field (ACTL)
3. Network Channel Code field (NC)

The BellSouth business rules also state that the Local Service Office field (LSO) is required when disconnecting ISDN BRI resale accounts.[3]

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[1] Version 7.5.0.15.r2.p1
[2] *BellSouth Business Rules for Local Ordering – OSS99, Issue 9N May 31*, 2001, pages 236-238. This document can be found at the following URL:
http://www.interconnection.bellsouth.com/guides/html/leo.html

These fields are located on the "UNE OPTIONS" screen, but are not available when using an Activity Type 'D'.

Impact:

The lack of consistency between BellSouth's RoboTAG application and applicable business rules could impact CLECs in the following ways:

- **Decrease in Customer Satisfaction.** CLECs might be exposed to delays if they are unable to submit orders due to programming inconsistencies with business rules. A delay in delivering a service to a customer could negatively impact a customer's view of a CLEC's reliability.

- **Increase in Operating Costs.** Ordering problems might require additional CLEC resources before completion. Delays in problem resolution increase the time CLECs expend to successfully process a customer's order.

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[3] *BellSouth Business Rules for Local Ordering – OSS99, Issue 9N May 31,* 2001, page 770.

FLA Exception 74 (TVV1).doc

Date: June 28, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

BellSouth's error responses are inconsistent with the *BellSouth Business Rules for Local Ordering, OSS99*[1], for conversions of Retail, Resale, and UNE-P accounts to Line Sharing accounts (Request type A/ Activity Type V). (TVV1)

Background:

CLECs rely on complete and accurate information from the BellSouth business rules that outline the methods and procedures for pre-ordering and ordering. As part of the guidelines outlined in the business rules, BellSouth has established Required, Conditional, Optional (R/C/O) charts that are specific to each service request type and are essential for the purpose of creating a Local Service Request (LSR). These charts list the fields required by BellSouth, and CLECs rely on the accuracy of these charts in their attempts to have their requests provisioned.

The R/C/O charts for REQTYP A Line Sharing service requests specifies Exchange Company Circuit ID's (ECCKT) as required for Line Activity (LNA) of C and Line Activity of D tables.[2] Furthermore, it is not currently possible for CLECs to identify the ECCKT field associated with a non-UNE loop service conversion to a UNE-Loop Line Sharing arrangement.

Issue:

BellSouth clarified and rejected the following Line Sharing service requests, requiring an ECCKT specification in a manner that is not consistent with the business rules. The orders constituted requests to convert Retail POTS customers to a Line Sharing arrangement. BellSouth responded to these orders with an error message stating, "ECCKT is required with REQTYP/ACT/LNA combination." The ECCKT field, however, is not a required or conditional field per the R/C/O charts in the business rules for this type of service request.[3]

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[1] BellSouth Business Rules for Local Ordering – OSS99, *Issue 9N May 31,* 2001. This document can be found at the following URL: http://www.interconnection.bellsouth.com/guides/html/leo.html
[2] BellSouth Business Rules for Local Ordering – OSS99, *Issue 9N May 31,* 2001, Section 3.9.4.

[3] BellSouth Business Rules for Local Ordering – OSS99, *Issue 9N May 31,* 2001, page 359.

FLA Exception 75 (TVV1).doc

104171FPEH101001	00	9993
104162FPTH105005	00	9993

Additionally, LENS does not allow this type of service request to be submitted because of the ECCKT field requirement. To enforce this requirement, BellSouth has front-end validation edits, which prevent the user from proceeding with the creation of the order until the ECCKT field is populated.

Impact:

The lack of consistency between BellSouth's interface edits and the business rules could impact CLECs in the following ways:

- **Decrease in Customer Satisfaction.** CLECs might be exposed to delays if they are unable to submit orders due to conflicting implementation of business rules. A delay in delivering a service to a customer could negatively impact a customer's view of a CLEC's reliability.

- **Increase in Operating Costs.** Ordering problems might require additional CLEC resources before completion. Delays in problem resolution increase the time CLECs expend to successfully process a customer's order.